

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No:	19-06251
Joseph Ronduelas)		
Debtor,)	Chapter:	Chapter 13
)		
)	Judge:	Carol A. Doyle

NOTICE OF MOTION

To: Joseph Ronduelas, 3334 N Panama Ave , Chicago, IL, 60634
Tom Vaughn, 55 E. Monroe St # 3850, Chicago, IL, 60603
Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **Tuesday March 19, 2019 at 9.30 am.**, I shall appear before the Honorable Judge Carol A. Doyle in 219 S. Dearborn St., Courtroom 742, Chicago, IL and then and there present the attached **Motion to Extend the Automatic Stay**, a copy of which is attached hereto.

By: Scott Greenwood
Scott Greenwood

CERTIFICATE OF SERVICE

I, Scott Greenwood, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, at 55 E. Monroe, Suite 3400, Chicago, Illinois, on March 8, 2019.

By: /s/ Scott Greenwood
Scott Greenwood

Attorneys for the Debtors

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55 E. Monroe Street #3400
Chicago, Illinois 60603
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Ad Astra Recovery Serv
Bankruptcy Dept
7330 W 33rd St N Ste 118
Wichita KS 67205

Armor Systems Co.
Bankruptcy Dept
1700 Longwater Dr.
Norwell MA 02061

Asset Acceptance LLC
Bankruptcy Dept
PO Box 2036
Warren MI 48090

Big Picture Loans
Bankruptcy Dept
E23970 Pow Wow Tribal
Watersmeet MI 49969

Capital One Auto Finance
Bankruptcy Dept
4515 N Sante Fe Ave. Dept APS
Oklahoma City OK 73118

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SANJIV YAJNIK
President, Capital One Auto Finance
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Capital One Bank
Bankruptcy Dept
PO Box 71083
Charlotte NC 28272

City of Chicago Dept. of Finance
C/o Arnold Scott Harris P.C.
111 W Jackson Blvd Ste. 600
Chicago IL 60604

Harris & Harris, LTD
Bankruptcy Dept.
111 W Jackson Blvd Suite 400
Chicago IL 60604

Debt Recovery Solutions LLC
Bankruptcy Dept
900 Merchants Councourse Ste LL-11
Westbury NY 11590

Illinois Child Support Enforce
Bankruptcy Dept Christine Schmidt
509 S. 6th St
Springfield IL 62701

Kristen Marshall
Bankruptcy Department
4710 N. Alcott
Chicago IL 60640

Illinois State Toll Hwy Auth
Attn: Legal Dept - Bob Lane
2700 Ogden Ave.
Downers Grove IL 60515-1703

The IL Tollway
Bankruptcy Department
PO Box 5544
Chicago IL 60608

Merchants & Medcal
Bankruptcy Dept
6324 Taylor Drive
Flint MI 48507

Midwest Receivable Sol
Bankruptcy Dept
2323 Gull Rd Ste. E
Kalamazoo MI 49048

Nelnet Lns
Bankruptcy Dept
3015 S. Parker Rd Suite 400
Aurora CO 80014

Nelnet
Bankruptcy Dept
4 Quakerbridge Plaza PO Box 548
Trenton NJ 08625

Premier Bankcard/Charter
Bankruptcy Dept
PO Box 2208
Vacaville CA 95696

Speedy Cash
Bankruptcy Dept
PO Box 780408
Wichita KS 67278

T Mobile/T-Mobile USA Inc
C/o American InfoSource
4515 N Sante Fe Ave
Oklahoma City OK 73118

TCF
Bankruptcy Dept
1405 Xenium Ln N Ste 19
Saint Louis Park MN 55441

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MOTION TO EXTEND THE AUTOMATIC STAY

NOW COMES the Debtor, Mr. Joseph Ronduelas (the “Debtor”), by and through his attorneys, Geraci Law LLC, to present his **Motion to Extend the Automatic Stay** pursuant to 11 U.S.C. §§. 105 and 362(c)(3), and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 03/07/2019.
3. The Debtor filed a previous petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and on 09/18/2018, case number 18-26291. The case was dismissed on 01/29/2018.
4. The Debtor’s circumstances have changed as follows (see affidavit attached as Exhibit A):
 - a. In the previous case, the Debtor fell behind on his Chapter 13 plan payments due to confusion about paying the Trustee and not making all the required direct payments in the absence of an order for payroll control. By the time Debtor’s prior attorney got payroll control started (Proposed Order to Employer to Pay the Trustee was filed with this Court on 1/9/2019) it was already 4 months into the case and too late to get on track or catch up; the case was dismissed 20 days later.

- b. The Debtor is still working at the same job as the prior case and now knows how to pay the Trustee directly until payroll control begins. Debtor's new attorney will submit the Proposed Order to Employer to Pay the Trustee at the start of the case rather than months in.
5. The Debtor is filing this case in good faith.
6. The schedules I and J of the previous case have been attached as Exhibit B, the schedules I and J of the current case have been attached as Exhibit C.

WHEREFORE, the Debtor, Mr. Joseph Ronduelas, prays this Court enter an order:

1. Extending the Automatic Stay as to all creditors until such time as the stay is lifted by a party in interest as to that party only following notice and a hearing or such time as this case is dismissed or discharged; and
2. Any other relief that this Court deems just and proper.

Respectfully submitted,

/s/ Scott Greenwood
Scott Greenwood

Attorneys for the Debtors

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

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